

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Antonio FLORES LORENZO

DOB: 1985

Citizenship: Mexico

Case No.

7:18mj2019

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 27, 2018 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

21 USC § 952

Offense Description

Illegal Importation of a Controlled Substance / Approximately 17.98
Kilograms of Cocaine, a Schedule II Controlled Substance

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

approved by
[Signature]

Sworn to before me and signed in my presence.

Date: 09/28/2018 8:27 a.m.

City and state: McAllen, Texas

[Signature]

Complainant's signature

Bradley M. Gaines II, HSI Special Agent

Printed name and title

[Signature]

Judge's signature

U.S. Magistrate Judge Juan Alinis

Printed name and title

Attachment "A"

I, Bradley M. Gaines II, am a Special Agent (SA) with the United States (U.S.) Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), and have knowledge of the following facts:

1. On September 27, 2018, HSI McAllen received a request for investigative assistance from the U.S. Customs and Border Protection (CBP) Office of Field Operations (OFO) at the Pharr Port of Entry (POE) in Pharr, Texas. CBP Officers (CBPOs) detained Antonio FLORES LORENZO (hereafter referred to as "FLORES LORENZO"), a Mexican National, after he attempted to enter the U.S. with approximately 17.98 kilograms (kg) of cocaine concealed within a non-factory compartment within the left and right rocker panel of a Dodge Avenger (hereafter referred to as "Load Vehicle"). The Load Vehicle is registered and insured to FLORES LORENZO.
2. During Primary Inspection, CBP Officers (CBPOs) obtained a negative oral declaration for fruits, food, alcohol, tobacco, drugs, weapons and currency over \$10,000.00 from FLORES LORENZO. FLORES LORENZO claimed ownership of the Load Vehicle. FLORES LORENZO stated that he purchased the Load Vehicle approximately 6 months ago. FLORES LORENZO stated he was traveling to McAllen, Texas to go shopping. CBPOs referred the Load Vehicle for Secondary Inspection.
3. During Secondary Inspection, FLORES LORENZO claimed ownership of the Load Vehicle. FLORES LORENZO stated that he purchased the Load Vehicle approximately 6 months ago. FLORES LORENZO stated he was traveling to McAllen, Texas to go shopping.
4. CBPOs conducted a non-intrusive X-Ray (Z-Portal) inspection of the Load Vehicle and observed anomalies within the left and right rocker panels. A CBP Narcotics Detection Dog (NDD) conducted a non-intrusive free air sniff of the Load Vehicle and alerted to the odor of narcotics emanating from the rocker panels.
5. During a physical search of the Load Vehicle, CBPOs discovered fourteen (14) silver foil wrapped packages concealed within a non-factory compartment inside the left and right rocker panel. The silver foil wrapped packages contained a white powdery substance which field tested positive for the characteristics of cocaine.
6. HSI SAs responded to the Pharr POE to assist in the investigation. HSI SAs interviewed FLORES LORENZO who admitted (Post-Miranda Warning) that he was hired by an individual to smuggle cocaine in to the U.S and would be compensated financially.
7. FLORES LORENZO will be charged with Illegal Importation of a Controlled Substance, in violation of Title 21, United States Code (USC), § 952.